



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA

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Order Instituting Rulemaking to Establish the  
California Institute for Climate Solutions.

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R.07-09-008  
(Filed September 20, 2007)

**REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 333-E)**  
**ON ORDER INSTITUTING RULEMAKING TO CONSIDER ESTABLISHING**  
**CALIFORNIA INSTITUTE FOR CLIMATE SOLUTIONS**

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**November 19, 2007**

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California Institute for Climate Solutions

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ESTABLISHING CALIFORNIA INSTITUTE FOR CLIMATE SOLUTIONS**

**I.**

**INTRODUCTION**

Pursuant to the California Public Utilities Commission's (Commission) September 20, 2007 Order Instituting Rulemaking to Establish the California Institute for Climate Solutions (the Order), Southern California Edison Company (SCE) submits the following Reply to opening comments filed by parties on November 2, 2007. SCE continues to support the mission of the CICS as described in the Order. SCE believes that research – particularly in the area of technology development – is vital to solving the challenge of global warming over the long term. Technology development for renewables, energy efficiency, and clean coal is crucial to transforming California and the world to a lower carbon-emitting society. SCE believes that a coordinated research institute such as the CICS proposed in the Order will facilitate such developments.

Parties' opening comments reflect a number of similar themes. Like SCE, most parties support the Commission's efforts to develop a coordinated statewide effort to research solutions to the climate change predicament. Also like SCE, numerous parties echo concerns regarding

the mechanism proposed by the Commission for funding the CICS, the potential for duplicative research endeavors, and the need for direct ratepayer benefits and a governance structure that will ensure such benefits. As discussed more fully in this Reply, SCE supports these parties' comments, and asks the Commission to further explore how it can equitably fund the CICS and ensure that all who will benefit from the CICS will share in its cost. SCE also supports the numerous parties' comments which seek to ensure that the research conducted by the CICS complements, rather than duplicates, the ongoing work of other agencies and research institutions. SCE further agrees that the governance structure of the CICS should be designed to ensure ratepayer benefits and should include utility representatives who can provide input on the research and demonstration projects that are needed and will provide direct benefits to ratepayers.

In this Reply, SCE expresses its support for the comments mentioned above. SCE also responds to parties' comments that utility shareholders should fund some or all of the CICS. As provided below, investor-owned utility shareholders should not be required to fund the CICS, which, as proposed, is a mandatory public purpose program. SCE also addresses the intellectual property issues raised by the parties, and asks the Commission to explore these issues further once the CICS is more defined.

## **II.**

### **REPLY COMMENTS**

#### **A. Numerous Parties Agree that the CICS Should Be Funded by All Californians.**

Numerous parties echo the concern raised by SCE that the Order essentially proposes that the customers of the state's three largest Investor-Owned Utilities (IOUs) shall alone bear the cost of research that would benefit the entire state, and arguably the entire world. These diverse parties note the exceptionally broad nature of the issues to be addressed by the CICS, and agree with SCE that the Commission should seek an equitable funding mechanism that will reach all Californians who will benefit from the Institute. For example, TURN states:

“Public financial support for the CICS proposal should be provided from taxes rather than energy utility rates. The proposal would deliver \$600 million over the next ten years to the University of California, where the funds would by design underwrite activities that extend far beyond utility service provided by investor-owned utilities, far beyond the energy utility sector itself, and even far beyond the California state border. If such a proposal warrants public funding, it should come from the more traditional source of funding of such efforts to provide broad public benefit – tax revenues, not utility rates.”<sup>1</sup>

Similarly, PG&E notes that legislation should be considered to facilitate participation by other emission-causing sectors and municipal utilities:

“Because the Institute’s research is expected to benefit all California electric and gas utility customers, publicly owned utilities should also participate in funding of the Institute. Likewise, the scope of the Institute should only be expanded to include research that benefits other sectors, e.g. the transportation sector, if appropriate funding and participation from those sectors is involved. In order to provide for participation by the publicly owned utilities and transportation-related entities, a broader legislation authorization should be considered.”<sup>2</sup>

The Independent Energy Producers Association (IEP) also notes the inequitable nature of focusing solely on IOU ratepayers when the benefits of the institute will flow to all Californians:

“First, the proposal places responsibility for the costs of the Institute only on the customers of the IOUs, although the benefits of the Institute will flow to all Californians and ultimately to the world (a point raised by Commissioner Bohn in his Concurring Opinion). It would obviously be more equitable to spread the costs of the Institute more broadly, to include the participation of at least the customers of the municipal gas and electric utilities in the funding of the Institute.”<sup>3</sup>

SDG&E echoes these concerns:

“[I]t must be recognized that the potential benefits are broad enough that the CICS should be funded by California citizens instead of IOU customers. For this same reason, funding sources

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<sup>1</sup> TURN Opening Comments, p. 3.

<sup>2</sup> PG&E Opening Comments, p. 7.

<sup>3</sup> IEP Opening Comments, pp. 1-2.

should be broadened to include other sectors, including customers of publicly owned utilities, the transportation sector, etc.”<sup>4</sup>

DRA makes similar arguments:

“The potential benefits of the Institute are broadly-based and are subject to the expertise and jurisdiction of state agencies other than the Commission, including the Air Resources Board, Department of Health Services, and the Department of Fish and game, among others. Stakeholders other than the ratepayers of Commission-regulated utilities are equally suited and appropriate for funding the Institute. For example, any benefits to the electricity sector would also be advantageous to customers of municipal utilities; water ratepayers seem equally as likely to gain from the Institute as do electricity and natural gas ratepayers; other stakeholders – including the transportation sector – would also benefit. Funding for the Institute should be spread equitably among these constituents.”<sup>5</sup>

SCE appreciates the Commission’s efforts to reach a greater number of Californians by including gas customers served by the IOUs within the funding base for the CICS. The Order’s proposal will allow the majority of Californians served by municipal electric utilities to share in at least some portion of the cost of the CICS through the gas rates allocation. This does not entirely solve the equity issue,<sup>6</sup> however, and SCE urges the Commission to carefully consider exploring alternative funding mechanisms for the CICS. As TURN, DRA, IEP, and all of the utilities note, these alternative sources should include not only IOU customers, but all emission-causing sectors (*e.g.* transportation, agriculture, etc.) and all members of the public who benefit from the research. SCE supports these parties’ suggestion that the Commission consider pursuing the CICS through a tax or bond measure so that all emission-causing sectors can share in the costs of the CICS, and all residents in the State will equitably and fairly fund the Institute, regardless of whether they are municipal utility customers, Direct Access customers, or IOU customers. The Commission should then adjust the funding borne by energy ratepayers to

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<sup>4</sup> SDG&E Opening Comments, pp. 4-5.

<sup>5</sup> DRA Opening Comments, p. 9.

<sup>6</sup> In this instance, IOU customers will pay for the Institute through both gas and electric rates, while municipal utility customers will only pay for the Institute through gas rates.

appropriately reflect the costs of the Institute associated with its activities focused on energy-sector solutions.<sup>7</sup>

**B. Numerous Parties Agree that Coordination is Needed to Ensure that Institute Research Opportunities are Not Duplicative of Ongoing Programs and Projects.**

SCE agrees with the nearly unanimous commenting parties that the CICS should not duplicate ongoing research being conducted by other governmental agencies, academic institutions, and ratepayer-funded programs. As noted by PG&E, close coordination with other existing programs and research-conducting agencies will be imperative to maximize cost effectiveness and Institute results. SCE supports PG&E's recommendation to include a formal process for coordinating research with other programs and agencies.

SCE further agrees with those parties who advocate for utility representation on the CICS Governing Board and steering committees. SCE believes that such representation will help reduce the potential for duplication and is also critical to ensuring that the research programs and projects undertaken by the CICS will provide direct benefits to the utility customers. As noted by PG&E, the utilities have extensive knowledge and experience with emerging technologies and current RD&D and can assist in the selection of projects that will ultimately lead to the greatest customer benefit.<sup>8</sup>

**C. Shareholders Should Not Be Required to Pay for the CICS.**

Some parties maintain that IOU shareholders should be required to pay for some or all of the cost of the CICS. SCE disagrees. As SCE noted in its Opening Comments, not only would such action by the Commission raise significant issues concerning the Commission's authority to order such funding activity, but it would also be inequitable to impose the costs of a mandatory

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<sup>7</sup> Both DRA and PG&E urge the Commission to ensure that ratepayer funds are not used for activities that are unrelated to the energy sector or the needs of the ratepayers. SCE agrees. *See* DRA Opening Comments, p. 12; PG&E Opening Comments pp. 3, 7.

<sup>8</sup> PG&E Opening Comments, p. 12.

statewide public purpose program on the shareholders of one particular industry segment. The Commission would essentially be using its authority to regulate electricity rates and service to force the investors of one industry segment to fund a program that will benefit the public at large, including other company's customers and shareholders. As noted by PacifiCorp, however, the IOUs' obligation to serve customers (and the Commission's regulation of that activity) does not extend to mandatory shareholder financing of public university institutions and climate-related research projects.<sup>9</sup> Currently, investors wishing to dedicate their resources to climate-related RD&D may seek out the most viable research firm and expect a return on their investment. A mandatory IOU shareholder funding obligation does not allow utility investors the choice to invest in the CICS or provide investors with a direct and measurable return on their investment. SCE believes that any shareholder funding of the Institute should be voluntary. The Commission may encourage donations or other support from IOU shareholders, but for the reasons provided herein and in various parties' comments, the Commission should not mandate that IOU shareholders pay all or some of the cost of the CICS.

**D. Further Detail Is Needed to Define Intellectual Property Rights**

A number of academic institutions commented that profitable technologies or patents resulting from the CICS should not be used to reimburse ratepayers for their investment in the Institute, and that the Bayh-Doyle Act may impact the ability of the Institute to leverage Federal funds. Like PG&E, SCE continues to maintain that, to the extent ratepayers fund the Institute, they should see a "return" on their investment and receive any direct benefits resulting from the Institute's research. SCE proposes that once the details of the Institute are defined, including how the Institute will be funded, the Commission should revisit the issue of how intellectual property resulting from the Institute should be treated.

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<sup>9</sup> PacifiCorp Opening Comments, p. 3

**III.**

**CONCLUSION**

SCE appreciates the opportunity to submit these Reply comments on the Order and looks forward to assisting the Commission with the development of the CICS.

Respectfully submitted,

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November 19, 2007



**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON ORDER INSTITUTING RULEMAKING TO ESTABLISH THE CALIFORNIA INSTITUTE FOR CLIMATE SOLUTIONS on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address.  
First class mail will be used if electronic service cannot be effectuated.

Executed this **19<sup>th</sup> day of November, 2007**, at Rosemead, California.

/s/ NAPA UTRAPIROMSUK

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